



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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JUL 15 2011

Ref: EPR-N

Mr. Don Ogaard
Bureau of Land Management
Utah State Office
P.O. Box 45155
Salt Lake City, UT 84145-0155

Re: November 2011 Oil and Gas Lease Sale,
Price Field Office

Dear Mr. Ogaard:

Thank you for the opportunity to review and comment on the Draft Environmental Assessment (EA) prepared by the Bureau of Land Management (BLM) for the November 2011 Competitive Oil and Gas Lease Sale in the Price Field Office. We understand that BLM has prepared this Draft EA to analyze and disclose the potential impacts of the sale of nine parcels in Carbon County, Utah, during the November 2011 competitive oil and gas lease sale. Furthermore, we understand that this Draft EA is tiered to the Price Field Office's existing Resource Management Plan (RMP), completed in October 2007. We also understand that six of the proposed parcels are located within an area recently analyzed in the West Tavaputs Plateau Natural Gas Full Field Development Plan Environmental Impact Statement (EIS), therefore, portions of the Draft EA are also tiered to this EIS. The remaining three parcels appear to be located within the Emery/Book Cliffs area, primarily a coal bed natural gas play.

Based on our review of the Draft EA, we question whether the document provides sufficient information to allow BLM to determine whether the leasing and potential development of the parcels (a connected action under NEPA) will have significant impacts on public health and the environment. To this end, we believe that associated potential impacts could be fully evaluated and disclosed if this Draft EA were to include the following:

1. An estimate of the maximum number of wells to be supported by the leases, based on reasonably foreseeable development (RFD) projections. According to the Price Field Office RMP, up to 900 wells are projected in the Emery/Book Cliffs play. Although it seems unlikely that all of these anticipated wells would be developed on the 3 Emery/Book Cliffs lease parcels, we don't see how an upper bound to the potential impacts can be known unless the EA includes a RFD well count.
2. An estimate of the additional surface disturbance expected to occur on the lease parcels proposed for sale, since estimated surface disturbance acreages are important for determining impacts to many resources including wildlife, air quality and water quality.
3. A projected inventory of criteria air pollutant and volatile organic compound emissions.

4. An assessment of potential air quality impacts associated with oil and gas development supported by the lease sale, including, where applicable, incorporation of the West Tavaputs EIS air quality analysis. EPA also recommends that BLM evaluate the RFD and emissions inventory to determine whether an air quality impact assessment should include air quality modeling and if BLM determines that no air quality modeling is needed, the EA include a qualitative narrative analysis of air quality and air quality related value impacts.

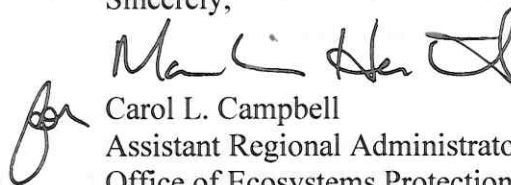
The EPA is also pleased to see in this Draft EA that BLM has proposed air quality mitigation measures applicable to oil and gas development occurring as a result of the proposed lease sale. Given recently measured high ozone levels monitored in the Uintah Basin and to ensure that these mitigation measures are employed, the EPA recommends the following:

1. The proposed list of mitigation measures be modified to be consistent with those contained in the West Tavaputs and the Greater Natural Buttes project EISs;
2. BLM rely upon the implementation of these measures to support a Finding of No Significant Impact or Finding of No New Significant Impact, and thus include these measures as lease stipulations or lease notices;
3. The EA include a discussion of how a future Plan of Development would consider the potential need for additional mitigation.

EPA also notes that the Record of Decision for West Tavaputs approved a contracted development that incorporated important mitigation measures to reduce project impacts to air quality and non-air quality resources. We therefore recommend that the EA describe those impacts that were identified in the ROD as requiring mitigation, and that compliance with this mitigation be identified in a lease notice for the six parcels in the West Tavaputs area to support the Finding of No New Significant Impact.

Thank you for the opportunity to comment on this Draft EA. If you have any questions or would like to discuss our comments, we would be happy to do so. Please feel free to contact Suzanne Bohan, Deputy Director of the NEPA Compliance and Review Program, at (303) 312-6925. You may also contact Molly Brodin, lead reviewer for this project, at (303) 312-6577 or by email at brodin.molly@epa.gov.

Sincerely,



Carol L. Campbell
Assistant Regional Administrator
Office of Ecosystems Protection and Remediation

cc: Leonard Herr
Bill Stringer